

13 CV 2008
CIVIL RIGHTS COMPLAINT
42 U.S.C. § 1983

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ANTHONY MCCORD

Full name of plaintiff/prisoner ID#

Plaintiff,

JURY TRIAL DEMAND

YES X NO _____

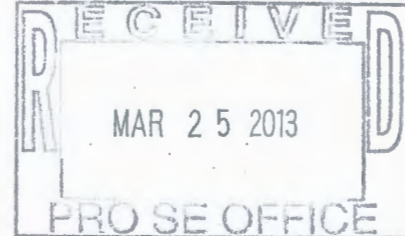
-against-

THE CITY OF NEW YORK, THE NEW YORK POLICE
DEPARTMENT, OFFICER PATRICK ANGST SHIELD# 1813,
DETECTIVE DENEZZO (**BOTH OF THE 75TH PRECINCT**)

Enter full names of defendants

[Make sure those listed above are
identical to those listed in Part III.]

Defendants.
-----X



I. Previous Lawsuits:

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes (X) No ()
- B. If your answer to A is yes, describe each lawsuit in the space below (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs: Anthony McCord

Defendants: Officer Rhoe, et al.

2. Court (if federal court, name the district;
if state court, name the county)
SDNY

3. Docket Number: 11 CV 5850 (WHP)

4. Name of the Judge to whom case was assigned: William Pauley

5. Disposition: (for example: Was the case dismissed? Was it
appealed? Is it still pending?)
Settled

6. Approximate date of filing lawsuit: Unknown

7. Approximate date of disposition: January 9, 2013

II. Place of Present Confinement: Sing Sing Correctional Facility

A. Is there a prisoner grievance procedure in this institution? Yes (x) No ()

B. Did you present the facts relating to your complaint in the prisoner
grievance procedure? Yes () No (x)

C. If your answer is YES,

1. What steps did you take? _____

2. What was the result? _____

D. If your answer is NO, explain why not This has nothing to do with
D.O.C.

E. If there is no prison grievance procedure in the institution, did you complain
to prison authorities? Yes () No (x)

F. If your answer is YES,

1. What steps did you take? _____

2. What was the result? _____

III. Parties:

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff ANTHONY MCCORD

Address Sing Sing Corr.Fac.354 Hunter St.Ossining,N.Y.10562.

(In item B below, place the full name and address of each defendant)

B. List all defendants' names and the addresses at which each defendant may be served. Plaintiff must provide the address for each defendant named.

Defendant No. 1

NEW YORK CITY

Defendant No. 2

NEW YORK POLICE DEPARTMENT

Defendant No. 3

OFFICER PATRICK ANGST SHIELD # 1813

75TH PRECINCT

BROOKLYN, NEW YORK

Defendant No. 4

OFFICER DENEZZO

75TH PRECINCT

BROOKLYN, NEW YORK

Defendant No. 5

[Make sure that the defendants listed above are identical to those listed in the caption on page 1].

IV. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 ½ by 11 sheets of paper as necessary.)

SEE APPENDIX ATTACHED FOR STATEMENT OF CLAIM.

IV. A If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

I did not recieve any medical treatment for the injury to my head, but was later transported to the hospital and treated for an upper respiratory infection which was inhibiting my breathing.

STATEMENT OF FACTS

Claimant hereby contends that on or about March 29, 2010 and at times after, defendants Detective Angst and Detective Denezzo of the 7 precinct, individually and or acting in concert, did engage in the following conduct or activities causing claimant to sustain injury and harm as a result of the civil rights violations claimant was subjected to when the defendants knowingly and purposely did the following:

-Entered claimants dwelling and or place of residence without a proper warrant or without the claimants consent or permission.

-Illegally seized property from claimants private abode without a warrant, the claimants consent or proper justification to do so.

-Illegally searched the private premises of claimants residence without a warrant, permission from claimant or probable cause to do so.

-Disregarded and ignored claimants repeated requests to exercise his right to have an attorney present before, during and after he was interrogated.

-Coercing, pressuring, and or bribing claimant to initial a miranda rights card and otherwise acting in a manner calibrated to induce the claimant to waive his right to be free from self incrimination. Including but not limited to denying the claimant medical attention until he signed said miranda card and or spoke to the officers.

-Acting in a manner consistent with the orchestration of activities designed and calibrated to obtain incriminating statements from the claimant through use of the complaining witnesses acting as direct agents of the law while inside the police station.

-Causing and or inducing complaining witnesses Latoya Montgomery and Nastasha Adorno to engage in perjury, filing of a false complaint, and false testimony in order to bolster and support false charges lodged against the claimant; including but not limited to pressuring, coercing, and or otherwise suggesting to complaining witness Nastasha Adorno that it would be in her best interest (as a parolee) to say that her alleged perpetrators possessed a firearm.

-Act in a manner consistent with that which would cause both above listed complaining witnesses to provide false statements, and or false testimony that would support the lodging of a false complaint against the claimant.

-Tampering with crimescene evidence or purposely failing to include or collect crimescene evidence (including surveillance footage) for the sole purpose of covering defendants illegal tactics and activities including but not limited to their illegal entrance into a private residential dwelling; and also to inhibit claimant from lodging a

defense against the false charges the defendants knew they would cause to be lodged against the claimant.

-Striking claimant in the head without cause or justification for the use of such force.

The claimant hereby asserts that the above referenced dwelling, which was illegally entered and searched, is located at 629 Wilson Avenue apartment 1B, Brooklyn New York; and that as a direct result of the illegal tactics engaged in by the above named defendants he was arrested and charged with several serious crimes.

The claimant further asserts that the indictment number for the crimes in which he was charged is 2787/2010 filed in Kings County Supreme Court.

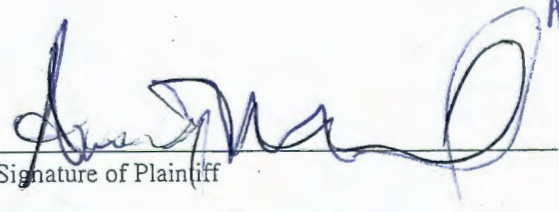
V. Relief:

State what relief you are seeking if you prevail on your complaint.

10 MILLION DOLLARS IN COMPENSATORY DAMAGES, AND 3 MILLION DOLLARS
IN PUNITIVE DAMAGES.

I declare under penalty of perjury that on MARCH 22, 2013, I delivered this
(Date)
complaint to prison authorities to be mailed to the United States District Court for the ~~Eastern~~ ^{SOUTHERN}
District of New York.

Signed this 22 day of MARCH, 2013 I declare under penalty of
perjury that the foregoing is true and correct.


Signature of Plaintiff

SING SING CORR.FAC.

Name of Prison Facility

354 Hunter Street

Ossining, New York 10562

Address

12A2688

Prisoner ID#